



DEPARTMENT OF THE TREASURY

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Acquisition Bulletin (AB)

No. 07-02 R2

October 30, 2009

MEMORANDUM FOR BUREAU CHIEF PROCUREMENT OFFICERS

FROM:

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SUBJECT:

AB 07-02 R2: Treasury Procurement Data Integrity Procedures

Purpose: This Acquisition Bulletin (AB) serves to update the Departmental plan for assuring the accuracy of data entered into the Federal Procurement Data System – Next Generation (FPDS-NG) through validation and verification (V&V).

Effective Date: This AB is effective immediately.

Expiration Date: This AB will expire when cancelled or superseded.

Background: On October 7, 2009, the Office of Federal Procurement Policy (OFPP) issued a memorandum containing guidance on improving the quality of acquisition data. This guidance builds on and supersedes the May 9, 2008, OFPP-issued memorandum requiring additional steps to verify and validate the accuracy of data in FPDS-NG. The May 9, 2008, memorandum required each Chief Acquisition Officer (CAO) to establish requirements to ensure that FPDS-NG data are accurate and timely by including additional information on the desired format for reporting V&V of FPDS data, based on lessons learned and best practices developed over the past year.

The October 7, 2009, memorandum builds on and supersedes the FY 2008 guidance for verifying, validating, and certifying FPDS data in accordance with the following enhanced guidelines:

1. Agencies are now required to provide more explicit information in the planning and certification reports to support a complete assessment of their data quality improvement activities or the identification and sharing of best practices.
2. The sampling methodology for FY 2009 has been upgraded by requiring that the new sampling design and sample size be sufficient to produce statistically valid conclusions for the overall department or agency at the 95% confidence level, with a margin of error of no more than +/- 5 percentage points;

3. The list of data elements has been revised to focus on the most widely used and most important data fields, and certain data whose accuracy were dependent on data entered by other agencies have been excluded from the quality review to ensure that agencies are not penalized for data errors for externally generated data over which they have no control.

Based on this memorandum, Treasury must certify the FY 2009 procurement data and submit the required report to OFPP by January 5, 2010.

Actions Required:

1. Bureau Chief Procurement Officers (BCPOs) shall:
 - a. Conduct annual V&V in accordance with the V&V Process described below. Each bureau V&V Report is due each year on the last business day on or before December 15.
 - b. Develop a plan for ensuring that all staff with data entry and review functions have a data accuracy evaluation factor in their performance appraisal and receive appropriate management feedback for their role in promoting and maintaining procurement data integrity. The Contracting Officer is ultimately responsible for the accuracy of data supplied to FPDS.
 - c. Implement agreed corrective action plans as identified in the V&V Report and provide status updates to OPE on a quarterly basis. The status update is due on the last business day of each quarter.
2. The Office of Procurement Executive (OPE) shall:
 - a. Define the scope of each Bureau V&V review no later October 30 of each year.
 - b. Review Bureau V&V Reports and approve the recommendations and proposed corrective action plans.
 - c. Track accuracy trends by bureau and by data field.
 - d. Provide certification of data accuracy and completeness to GSA each year in keeping with each bureau's performance.
 - e. Submit Exhibit 1 of the October 7, 2009 Memorandum to OFPP by January 5 each year.
 - f. Periodically test the Bureau V&V testing procedures as part of the OPE Evaluate and Monitor program.

V&V Process:

By October 30 of each year, OPE will compile the complete list of PIIDs for review, along with their associated data from FPDS-NG. This list will be called the V&V Review List. This list will be comprised of the fewest number of actions that cumulatively sum to 75% of total dollar obligations, as well as a sample of actions in the bottom 25% of dollar obligations that achieves a margin of

error of plus or minus 5% with a 95% confidence level.

Each bureau (Contracting Agency) that uploads records to FPDS-NG shall follow the V&V Process steps as identified below:

Step 1: Perform V&V Review. The BCPO shall arrange to have each PIID on the V&V Review List reviewed by a person working outside the contracting unit that performed the transaction, for example another operational contracting branch or a procurement policy office. Very small bureaus with no such organizational structure may organize V&V swaps with other bureaus' staff, or work with their own accounting, finance, Inspector General, or other staff to support the activity.

The V&V reviewers shall conduct the review using the Department of the Treasury Validation and Verification Review Worksheet (Worksheet) (Attachment 2). The Worksheet contains a template for each of the various Indefinite Delivery Vehicle (IDV) or Award Types available in the FPDS-NG system. Types include Delivery/Task Order, Purchase Order, Definitive Contract, BPA Call, Blanket Purchase Agreement, Basic Ordering Agreement, and Other Indefinite Delivery Vehicle. For each PIID assigned, the reviewer shall compare the data for each field in the Worksheet PIID contained in the V&V Review List to the contract file. If the data to support the correct value in FPDS-NG are not available in the contract file, the V&V reviewer may use alternative means to determine the correct value. For example, the V&V reviewer may interview the Contracting Officer responsible, or refer to other relevant sources of information. If the review cannot find any basis upon which to validate the FPDS-NG data, the FPDS-NG data shall be considered in error, and the basis of the error shall be noted clearly in the findings comments.

Regardless of whether or not it was previously required by FPDS-NG to validate a record, complete and accurate data entry in the 'V&V Minimum Review Fields' listed below is mandatory at the Department of the Treasury, effective immediately. This means that when an FPDS-NG data entry template allows a value to be entered, an accurate value shall be entered. This requirement recognizes that data for some fields below are only logical when using certain FPDS-NG templates. The Worksheet contains only the fields applicable to the specific template. For example, 'Referenced IDV PIID' only makes sense in the context of entering data about a task or delivery order and is included on that template. 'Reference IDV PIID' is not on the template for a purchase order.

Treatment of Null Values: It is recognized that some of the fields below, e.g., '6F Performance Based Services Acquisition' are check boxes which are either checked or unchecked. The Treasury requirement is that this field must be accurately completed.

Additionally, for some of the fields a null value may be an acceptable answer. The reviewer has the ultimate responsibility to ensure that the answer, or lack thereof, is the most appropriate answer for that particular field.

V&V Minimum Review Fields

The following fields shall be reviewed as part of the V&V Process. Additional fields may be reviewed at the initiative of each BCPO, such as socio-economic data. The number before the field name refers to the element number in the FPDS-NG Data Element Dictionary. Not all fields apply

to each of the review templates.

2A 'Date Signed'	9A 'DUNS Number' ¹
2C 'Completion Date'	9H 'Place of Manufacture' ¹
2D 'Est. Ultimate Completion Date'	9K Place of Performance ZIP Code (+4)
2E 'Last Date to Order'	10A 'Extent Competed' ¹
3A 'Base and All Options Value'	10C 'Reason Not Competed' ¹
3B 'Base and Exercised Options Value' ¹	10D 'Number of Offers Received' ¹
3C 'Action Obligation' ¹	10N 'Type of Set Aside' ¹
4C 'Funding Agency ID' ¹	10R 'Statutory Exception to Fair Opportunity'
6A 'Type of Contract' ¹	11A 'CO's Business Size Selection' ¹
6F 'Performance Base Service Acquisition' ¹	11B 'Subcontracting Plan' ¹
6M 'Description of Requirement' ¹	12A 'IDV Type' ¹
8A 'Product/Service Code' ¹	12B 'Award Type' ¹
8G 'Principal NAICS Code' ¹	

If an error is found as part of the independent V&V review process, the V&V reviewer shall record an error as part of the V&V report. This is critical to preserve the statistical validity of the V&V process. Failure to properly record an error during the V&V process, or targeted efforts to "clean up" records identified for V&V review before the V&V reviewer has examined them, if discovered, will result in the requirement for subsequent reviews to be performed by an outside entity satisfactory to OPE, with any associated costs to be paid by the bureau.

Correction of any errors found during the V&V review *after* having recorded and accounted for them as a statistical matter is **required**. The timing of corrections should be included in the corrective action plan

Step 2: Conduct Root Cause Analysis and Identify Corrective Actions. To consolidate the findings from each of the individual PIID V&V reviews, each BCPO shall designate one or more people to perform analysis to consider how or why each error occurred, identify patterns, or investigate the root nature or cause of the issue. Errors may be caused for different reasons, for example, by system issues, training issues, lack of supervisory emphasis, or other causes. The analysis team should have access to (and may be the same people as) the Independent V&V reviewers.

Corrective actions should attempt to address not just the immediate fix of a data error, but to address the root cause of the error. Corrective actions might include, but not be limited to:

- Recommendations for changes in the settings and validations of the CWS and/or FPDS-NG systems;
- Required policy or definitional clarifications;
- Training issues and needs; or
- Other ideas for improvement.

Step 3: Compile the V&V Report. Each bureau shall report the results of the V&V to OPE no later than December 15 by fully completing Attachment 1, Error Summary Report Spreadsheet, in accordance with the instructions provided by OPE. The report shall be submitted by the BCPO or designee. Any designation shall be communicated, in writing (email or hardcopy), to OPE.

Questions about this AB may be directed to Fernando T. Tonoletе via e-mail at Fernando.tonolete@do.treas.gov or via phone at (202) 622-6416.

Attachments (3):

1. Error Summary Report Spreadsheet, dated October 30, 2009:



2. Department of the Treasury Validation and Verification Review Worksheet, dated October 30, 2009



3. OMB Memorandum, Improving Acquisition Data Quality – FY 2009-2010 FPDS Data, dated October 7, 2009

